

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

UNITED STATES OF AMERICA)
)
)
v.)
)
JESUS GONZALO PALAZUELOS SOTO)

No. 1:13-cr-79-JL

JOINT PROPOSED PROTECTIVE ORDER REGARDING DISCOVERY

The United States of America, by John P. Kacavas, United States Attorney for the District of New Hampshire, and the defendant, Jesus Gonzalo Palazuelos Soto, through his counsel Richard Bradford Bailey, Esquire and Julie Connolly, Esquire, request that the Court grant the following protective order in this matter.

The United States will provide unredacted discovery to counsel for the defendant under the expansive discovery practice of the District of New Hampshire. The United States anticipates that almost all of the discovery will be provided in electronic form on DVDs, thumb drives, or external hard drives.

Counsel for the defendant agree that they will not share the discovery with anyone who is not a member of or an employee of their firms. Counsel agree that the discovery provided to counsel will not be shared under any form of joint defense agreement. Counsel agree that if it becomes necessary to share the discovery with any other person, counsel will file a motion seeking the court's approval for such distribution. The United States understands that any such filings may include ex parte motions filed by counsel for the defendant.

Counsel for the defendant or the United States will provide discovery to the defendant in an electronic form that complies with the regulations of the facility at which the defendant is housed. Counsel for the defendant agree that they will not provide paper copies of the discovery

to the defendant. The defendant agrees that he will not share the discovery with anyone other than his counsel or members and employees of their firms.

At the conclusion of this case, the defendant and his counsel will return to the United States all discovery provided by the United States or certify that any such discovery has been destroyed.

Respectfully submitted,
JOHN P. KACAVAS
United States Attorney

/s/ Donald Feith
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/s/ Richard Bradford Bailey
Richard Bradford Bailey, Esquire
Counsel for Jesus Gonzalo Palazuelos Soto

/s/ Julie K. Connolly
Julie K. Connolly, Esquire
Counsel for Jesus Gonzalo Palazuelos Soto

THE PROPOSED PROTECTIVE ORDER IS:

GRANTED _____

DENIED _____

The Honorable Joseph Laplante
Chief Judge, District of New Hampshire